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Subject: Regulation DD - Overdraft/Bounce Protection Services

Gentlemen:

The following comments are in response to the proposed revisions to Reg DD and overall guidelines for overdraft or "bounce" protection programs provided by banks.

30-day charge off - We agree that an account which has been overdrawn for 30 days requires special attention and charge off. We monitor the program from a centralized department within our company and although the charge off is initiated at 30 days, the actual charge off is concluded within 45 days. This allows sufficient time to notify the branch which owns the account and permit them to make contact with the customer prior to the actual charge off. Historical data indicates that this method and time frame is beneficial.

Consider Daily Limits - the implementation of these controls would be an enormous financial and operational burden to have such controls and waivers added to the DDA application. Furthermore, each check paid and not returned for the customer is a service provided for which the customer should pay. The customer readily recognizes the benefit of this service and wants the bank to continue honoring their checks.

Periodic Statement Disclosures - Again, this would be a major revision to our application requiring extensive time and money to provide. At present, fees are readily identified and acknowledged to the customer. Additional aggregate totals are not going to change the customer's approach to this program. That's quite evident by the continued usage of the program by the customers who receive our counseling letters.

We readily understand the concerns of the regulators to protect consumers from programs which try to promote overdraft accounts, charge per diem fees or market the service improperly. Our program is designed around the guidelines provided by regulatory agencies. We've added the use of counseling letters and are presently

looking into providing the names of “financial counselors” to frequent users. But at some point the customer / consumer must take some responsibility for their actions. Additional programming and manual requirements placed on the banks will have a negative impact on all services. I would encourage you to leave the regulation “as is” for all of the banks that provide a service that the consumer likes and place any needed burden specifically on those who continue to not follow the guidelines provided.

Thank you for your consideration of my comments.